

# **Exhibit B**

**VIRGINIA:**

**IN THE CIRCUIT COURT OF THE CITY OF ALEXANDRIA**

RICHARD GRENELL	)	
	)	
Plaintiff,	)	
v.	)	CASE NO.: CL24001462
	)	
OLIVIA TROYE	)	
	)	
Defendant.	)	

**DEFENDANT'S NOTICE OF REMOVAL TO FEDERAL COURT**

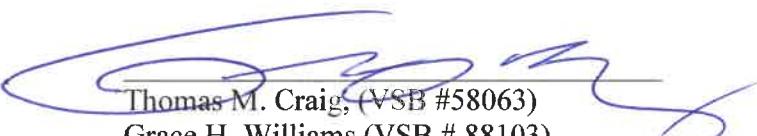
TAKE NOTICE that Defendant, Olivia Troye, by counsel, has filed a Notice of Removal of this action from the Circuit Court for the City of Alexandria to the United States District Court for the Eastern District of Virginia, Alexandria Division.

Defendant's Notice of Removal was filed on or around April 19, 2024, in the United States District Court for the Eastern District of Virginia, Alexandria Division, thereby effecting removal of this action and pursuant to 28 USC §1446(d), this Court shall proceed no further.

Defendant's Notice of Removal filed in the United States District Court for the Eastern District of Virginia, Alexandria Division is attached hereto as Exhibit A.

Dated: April 19, 2024

Respectfully Submitted,  
By Counsel



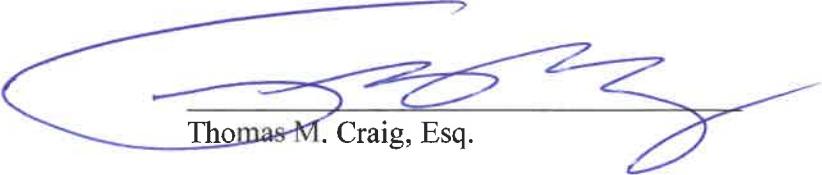
Thomas M. Craig, (VSB #58063)  
Grace H. Williams (VSB # 88103)  
Fluet  
1751 Pinnacle Drive, Suite 1000  
Tysons, Virginia 22102  
T: (703) 590-1234 | F: (703) 590-0366 fax  
tcraig@fluet.law  
gwilliams@fluet.law

*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 19, 2024, a true and correct copy of the foregoing Notice of Removal was served via email, facsimile, and U.S. Mail to the following attorneys of record:

Jesse Binnall, Esq.  
Jason Greaves, Esq.  
BINNALL LAW GROUP, PLLC  
717 King Street, Suite 200  
Alexandria, VA 22314  
F: 703-888-1930  
jesse@binnall.com  
jason@binnall.com

  
Thomas M. Craig, Esq.



(703) 590-1234 Tel  
(703) 590-0366 Fax

1751 Pinnacle Drive, Suite 1000  
Tysons, VA 22102  
[www.fluet.law](http://www.fluet.law)

**VIA COURIER**

April 19, 2024

J. Greg Parks, Clerk of the Court  
Alexandria Circuit, Court Civil Division  
520 King Street  
Room 307  
Alexandria, VA 22314

Re: ***Richard Grenell v. Olivia Troye***  
Case No. CL24001462

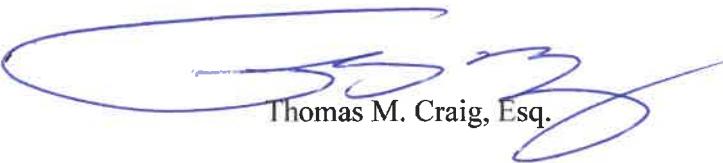
Dear Mr. Parks:

On behalf of Defendant, Olivia Troye, in the above-referenced matter, I have enclosed for filing Defendant's Notice of Removal to Federal Court.

Please date-stamp the extra copies enclosed and return it to me in the self-addressed, stamped envelope provided.

Should you have any questions, please do not hesitate to contact me by phone at (703) 590-1234 or by email at [tcaig@fluet.law](mailto:tcaig@fluet.law).

Sincerely,



Thomas M. Craig, Esq.

Encl.

Notice of Removal to Federal Court (original + copy)

cc.

Jesse Binnall, Esq. (via USPS, fax, and electronic mail)  
Jason Greaves, Esq. (via USPS, fax, and electronic mail)

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**IN THE CIRCUIT COURT OF THE CITY OF ALEXANDRIA**

RICHARD GRENELL	)	
	)	
Plaintiff,	)	
v.	)	CASE NO.: CL24001462
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Defendant.	)	

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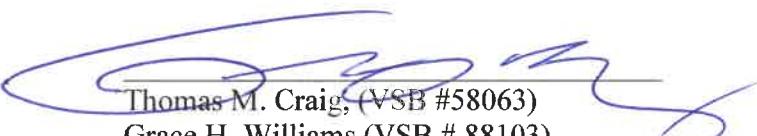
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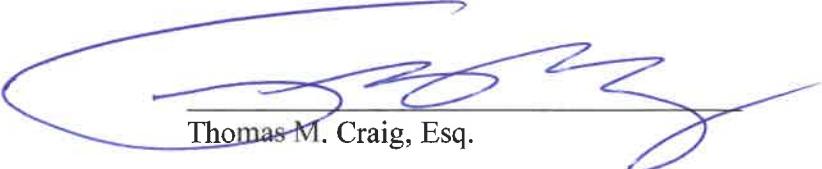
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jesse@binnall.com  
jason@binnall.com

  
Thomas M. Craig, Esq.

# Exhibit A

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

RICHARD GRENELL	)	
	)	
Plaintiff,	)	
v.	)	CASE NO.:
	)	
OLIVIA TROYE	)	
	)	
Defendant.	)	

**DEFENDANT'S NOTICE OF REMOVAL**

Defendant, Olivia Troye, by counsel, for her Notice of Removal pursuant to 28 USC §1332, §1441, and §1446, states the following:

1. Plaintiff filed a Complaint in the Circuit Court for the City of Alexandria styled as *Richard Grenell v. Olivia Troye*. A copy of Plaintiff's Complaint is attached hereto as Exhibit A.
2. Plaintiff has not served Defendant, but counsel became aware of the Complaint by observing the Alexandria Circuit Court docket.

**Grounds for Removal**

3. The removal of this action is timely and proper pursuant to 28 USC §1332, §1441, and §1446.

4. Defendant's Notice of Removal has been timely filed within thirty (30) days of receipt of Plaintiff's Complaint, and Defendant has not been served. *See, e.g., Gibbons v. Bristol-Myers Squibb Co.*, 919 F.3d 699, 705 (2d Cir. 2019); *Spigner v. Apple Hospitality REIT, Inc.*, No. 3:21-cv-00758, (E.D. Va. Mar. 1, 2022).

5. Defendant is simultaneously filing a Notice of Removal to Federal Court with the Circuit Court for the City of Alexandria, attached hereto as Exhibit B.

6. Upon information and belief, at all times relevant hereto, the Plaintiff, Richard Grenell, was a resident of California.

7. At all times relevant hereto, Defendant Olivia Troye, was a resident of Virginia.

8. The parties are citizens of different states and therefore there is perfect diversity of citizenship as contemplated by 28 USC §1332.

9. The Court has jurisdiction over this matter based on diversity of citizenship pursuant to the terms of 28 USC §1332(a)(c)(1).

10. Plaintiff's complaint seeks judgment against the Defendant in the amount of \$6,000,000.

11. Therefore, the amount in controversy exceeds the jurisdictional requirement of \$75,000.00 as contemplated by 28 USC §1332(a) for removal actions based on diversity.

12. Therefore, this suit should be removed to this Court pursuant to the provisions of 28 USC §1441.

13. The venue of the Eastern District of Virginia, Alexandria Division, is appropriate for purposes of removal pursuant to Rule 3 of the Local Rules of the United States District Court for the Eastern District of Virginia because the Eastern District of Virginia, Alexandria Division, embraces the City of Alexandria, where Plaintiff's State Court Complaint was filed.

14. Contemporaneous with the filing of this Notice, Defendant has provided to the adverse party, by counsel, written notice of this Notice of Removal.

Dated: April 19, 2024

Respectfully Submitted,

/s/ Thomas M. Craig

Thomas M. Craig, (VSB #58063)

Grace H. Williams (VSB # 88103)

**Fluet**

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Mark S. Zaid (*pro hac vice* forthcoming)

**Mark S. Zaid, P.C.**

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Washington, D.C. 20036

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Mark@MarkZaid.com

*Counsel for Defendant*

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/s/ Thomas M. Craig

Thomas M. Craig, Esq.

# Exhibit A

VIRGINIA:

IN THE CIRCUIT COURT FOR THE CITY OF ALEXANDRIA

RICHARD GRENELL,

Plaintiff,

v.

OLIVIA TROYE,

Defendant.

Case No. CL24001462

JURY TRIAL DEMANDED

COMPLAINT

Defendant Olivia Troye, maliciously utilizing her “insider” status as a former aide to Vice President Michael Pence, publicly claimed to have evidence that Ambassador Richard Grenell had ties to Nazis in Germany and that he tried to get Vice President Pence to attend a white supremacist event while in Germany. These vile allegations were patently false. Ambassador Grenell has spent his career fighting against extremists and bigots, as Ms. Troye well knows. In fact, Ambassador Grenell has shattered barriers, rising to become the first openly gay American to serve in President’s cabinet. Ms. Troye knew her statement was a lie when she posted it; she also made the allegation with reckless disregard for the truth. Upon Ambassador Grenell’s request for her to prove her statement or retract it, Ms. Troye responded with silence. Ms. Troye has not retracted or deleted her false statement on Twitter (now X), a global platform viewed by hundreds of millions of people daily. Ambassador

REPUTATION  
APR 12 PM : 1  
CLERK OF COURTS  
CITY OF ALEXANDRIA  
FILED

Grenell seeks to hold Ms. Troye accountable for her lies and states as follows in support of his Complaint:

**Parties**

1. Plaintiff Richard Grenell is a former acting Director of National Intelligence and a former United States Ambassador. He is a citizen of the State of California.

2. Defendant Olivia Troye is a former aide to Vice President Michael Pence and owner of The Troye Group LLC, which is a registered limited liability company in the Commonwealth of Virginia that consults on political issues to the private sector. Defendant Troye is a citizen of the Commonwealth of Virginia and the City of Alexandria.

**Defamatory Utterance**

3. On April 8, 2022, in response to someone asking if they have “proof” of Ambassador Grenell affiliating with Nazis in Germany while representing the United States as Ambassador, Defendant Olivia Troye publicly stated on Twitter (now X): “**I do. While in his role as Ambassador, Grennell [sic] tried to get Mike Pence to attend a white supremacist gathering during one of his overseas trips.**”

4. By affirmatively stating “I do” in response to that question, Defendant conveyed to an ordinary reader that she—a White House insider—had proof that Ambassador Grenell affiliated with or has ties to Nazis in Germany. It conveys to an ordinary reader that Ambassador Grenell in fact has ties to Nazis in Germany. This

is a lie. Defendant has no such proof because Ambassador Grenell did not and does not affiliate or have ties with Nazis in Germany or anywhere else.

5. The rest of Defendant's statement is also a lie. Defendant claims that Ambassador Grenell tried to get Mike Pence to attend a white supremacist gathering during an overseas trip. This never happened. Ambassador Grenell has never attended, much less attempted to have the Vice President of the United States attend, a white supremacist gathering.

#### **Factual Background**

6. Ambassador Grenell has served as a spokesman to four United States Ambassadors at the United Nations from 2001 to 2008.

7. In 2010, Ambassador Grenell founded the consulting company Capitol Media Partners, where he presently consults on policy and political communications.

8. Ambassador Grenell became the United States Ambassador to Germany, serving his country from May 8, 2018, until June 1, 2020.

9. While serving as a U.S. Ambassador, Ambassador Grenell was appointed as the acting Director of National Intelligence. He served as acting Director of National Intelligence from February 20, 2020, to May 26, 2020.

10. While acting Director of National Intelligence, Ambassador Grenell continued to serve as the U.S. Ambassador to Germany and was also a member of the special presidential envoy for Serbia and Kosovo peace negotiations.

11. Beginning in May of 2018, Ms. Troye served as special advisor to the Vice President for homeland security, counterterrorism, and North America.

12. In August of 2020, Ms. Troye was fired from her position in the Vice President's office.

13. Keith Kellogg, Vice President Pence's national security advisor and Ms. Troye's supervisor, explained from the White House press briefing podium that he fired her due to her performance.<sup>1</sup>

14. Mr. Kellogg went on to state that her work was subpar and that she was "no longer capable of keeping up with her day-to-day duties."<sup>2</sup>

15. Even Vice President Pence stated she was a disgruntled employee playing politics during an election year.<sup>3</sup>

16. In addition to being a disgruntled employee, Ms. Troye harbored deep-seated resentment for President Trump—who she believes to be the greatest individual threat to the republic in U.S. history—and his close advisors, like Ambassador Grenell, who she thought was "terrible" and was similarly undermining our democracy.

17. Because of her being publicly fired, Ms. Troye has engaged in a malicious smear campaign of misrepresentations and outright lies against members

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<sup>1</sup> Nick Niedzwiedek, *Pence aide blasts former coronavirus task force member who criticized Trump*, POLITICO (September 22, 2020), <https://www.politico.com/news/2020/09/22/pence-aide-blasts-olivia-troye-coronavirus-420063>.

<sup>2</sup> Jeanine Santucci, *Former Pence adviser on the coronavirus denounces Trump's pandemic response, backs Biden*, USA TODAY (September 17, 2020), <https://www.usatoday.com/story/news/politics/elections/2020/09/17/olivia-troye-former-pence-adviser-backs-biden-slams-trump-virus/3485668001/>.

<sup>3</sup> *Id.*

of the Trump Administration. It is because of her deep-seated resentment of President Trump and his close advisors, whom she views as dangerous and threats to democracy, that she decided to lie about Ambassador Grenell.

**Troye slanders Grenell**

18. On April 7, 2022, Ambassador Grenell tweeted his opinion of the Biden Administration restricting its search for potential nominees for the open U.S. Supreme Court seat to certain minorities.

19. An exchange of tweets ensued between Ambassador Grenell and U.S. Congressman Ted Lieu.

20. On April 8, 2022, Congressman Swalwell tweeted to Congressman Lieu a hateful comment that Ambassador Grenell hung out with Nazis during his time serving in Germany as the U.S. Ambassador to Germany. This was a lie.

21. Congressman Lieu replied to Congressman Swalwell, asking if he had proof of this allegation.

22. Defendant Olivia Troye then officially joined the conversation by tweeting that she did in fact have proof that Ambassador Grenell associated with Nazis. Ms. Troye went on to allege that Ambassador Grenell tried to have Vice President Pence attend a white supremacist event while the vice president was on an overseas trip:

Rep. Eric Swalwell  @RepSwalwell · Apr 8 · ...  
Hey @tedlieu, did you know @RichardGrenell used to hang out with Nazis when he was supposed to be representing us in Germany?

Richard Grenell  @RichardGrenell · Apr 7 · ...  
Ted LIEu spent years delivering the Beijing line that Hunter Biden's laptop was Russian disinformation.

China celebrated his lies. @tedlieu

1,060 2,253 9,569 

Ted Lieu  @tedlieu · Apr 8 · ...  
US House candidate, CA-36  
To be honest, I don't really know much about Grennell. (I just view him as a boring internet troll). Do you have proof of this?"

245 273 3,292 

Olivia of Troye  @OliviaTroye · ...  
Replying to @tedlieu @RepSwalwell and @RichardGrenell  
I do. While in his role as Ambassador, Grennell tried to get Mike Pence to attend a white supremacist gathering during one of his overseas trips.

4:13 PM · Apr 8, 2022 · Twitter Web App

1,119 Retweets 96 Quote Tweets 4,145 Likes

23. In Germany, being a Nazi is a serious crime. It is even a crime to openly sympathize with Nazis or promote Nazi ideas.

24. Knowing the serious ramifications of calling someone a Nazi and a white supremacist, and because she is bitter toward Trump administration officials in general and Ambassador Grenell in particular, Ms. Troye deliberately lied about Ambassador Grenell having ties to Nazis and of promoting Nazi ideology. She did so with reckless disregard for the truth or falsity of her allegations.

25. Ambassador Grenell tweeted to Ms. Troye regarding her slander, demanding that she back up her claims:

← Tweet



...

BS. You will say anything to be accepted by the DC crowd.

But let's play....you shouldn't be allowed to get away with slandering people.

What was the event I tried to get Mike Pence to attend?

Olivia of Troye @OliviaTroye · Apr 8

Replying to @tedlieu @RepSwalwell and @RichardGrenell

I do. While in his role as Ambassador, Grenell tried to get Mike Pence to attend a white supremacist gathering during one of his overseas trips.

6:23 PM · Apr 8, 2022 · Twitter for iPhone

26. Ms. Troye had a chance to retract her false statement, but she chose not to respond to Ambassador Grenell's tweet.

27. On April 9, 2022, Ambassador Grenell again tweeted at Ms. Troye following up on his request that she provide her proof or retract her tweet, stating "Olivia won't respond because she is slandering me."

28. To date, Ms. Troye has not retracted her slander of Ambassador Grenell or produced any of her alleged proof (which, of course, she cannot produce since it is a spurious lie).

29. The damage was already done, however, as her tweet was viewed by thousands, and multiple news outlets picked up Ms. Toye's lies, further spreading them.<sup>4</sup>

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<sup>4</sup> See, e.g., Rob Brigham, *Trump aide accused of Nazi ties—and a former Pence advisor says it's true*, RAW STORY (Apr. 8, 2022), <https://www.rawstory.com/richard->

30. Ms. Troye, as an experienced political operative, knew that being a former aide to the vice president would elevate the reach and perceived credibility of her tweet. She knew that her accusation, regardless of having no validity, would be picked up by the media and repeated without criticism or question. Too many people, in our impersonal, tech-laden world, believe that it is okay to spread vicious lies about someone on the internet, blithely slandering them from the perceived safety of their mobile phone. It is bad enough when these people are simply careless. But in this case, the Defendant is a savvy political operative, who has done it for the malicious purpose of denigrating and attacking the reputation of someone whose politics she dislikes.

**Causes of Action**

**COUNT I**  
**Defamation**

31. Ambassador Grenell incorporates by reference the above and subsequent paragraphs as though set forth fully herein.

32. Ms. Troye published and purposely caused to be published false and defamatory statements on Twitter (now X), a global platform, which did and had the tendency to harm Grenell and his reputation.

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grenell-nazis/; Aldous Pennyfarthing, Former Pence aide: Trump adviser tried to get VP to attend white supremacist gathering, DAILY KOS (Apr. 9, 2022),  
<https://m.dailyskos.com/stories/2022/4/9/2091020/-Former-Pence-aide-Trump-adviser-tried-to-get-VP-to-attend-white-supremacist-gathering>.

33. Ms. Troye's statement on Twitter, including the context of the tweets to which she was responding, accused Ambassador Grenell of associating with Nazis and of promoting a Nazi gathering to Vice President Pence.

34. The defamatory statement on Twitter is false.

35. Ms. Troye published the defamatory statements on Twitter knowing they were false or with reckless disregard for the truth of the statements.

36. The defamatory statement posted by Ms. Troye on Twitter is defamatory because the intention was to injure Ambassador Grenell's personal character, affecting his trade, business, and profession, by accusing Ambassador Grenell of being a white supremacist and associating with them on a global platform.

37. The defamatory statement posted on Twitter has directly and proximately caused Ambassador Grenell to suffer significant damages, including pecuniary damages, damage to his reputation, humiliation, embarrassment, and mental anguish, all of which are ongoing in nature and will be suffered in the future. These damages were foreseeable to Ms. Troye.

38. Ms. Troye published the defamatory Twitter statement knowingly, intentionally, willfully, wantonly, and maliciously, with intent to harm Ambassador Grenell, or in blatant disregard for the substantial likelihood of causing him harm, thereby entitling Ambassador Grenell to an award of punitive damages.

39. As a direct and proximate result of the misconduct of Ms. Troye, Plaintiff Richard Grenell is entitled to compensatory, special, and punitive damages in an amount to be proven at trial of \$5,000,000.

**COUNT II**  
**Defamation Per Se**

40. Ambassador Grenell incorporates by reference the above and subsequent paragraphs as though set forth fully herein.

41. Ms. Troye's defamatory statement about Ambassador Grenell—that he associates with Nazis and promotes Nazi ideology—is defamatory per se because it imputes unfitness to perform the duties of his employment and a want of integrity in the discharge of his duties, and it certainly prejudices him in his profession. Indeed, there are few things that are as vile as being a Nazi or white supremacist. A false accusation of such an association is equally loathsome.

42. As a lifelong advocate for the rights of persecuted minorities, and currently a consultant on public policy, a false accusation that he associates with and promotes Nazis or white supremacists is devastating to his reputation for integrity and would make him poisonous and anathema in the professional community where he operates and earns his living if not corrected.

43. In addition to the obvious prejudice to Ambassador Grenell's profession, the defamatory statements essentially accuse Ambassador Grenell of committing a crime, because Ms. Troye accused him of affiliating with Nazis while in Germany and of promoting a Nazi event, also while in Germany, where it is a crime to be a Nazi or to promote Nazi ideology.

44. Ambassador Grenell is entitled to compensation for the resulting damages to his reputation, humiliation, embarrassment, and mental anguish, all of which are ongoing in nature and will be suffered in the future.

45. As a direct and proximate result of the misconduct of Ms. Troye, Plaintiff Richard Grenell is entitled to compensatory, special, and punitive damages in an amount to be proven at trial of \$5,000,000.

**Jury Demand**

Plaintiff Richard Grenell demands a trial by jury on all issues so triable.

**Prayer for Relief**

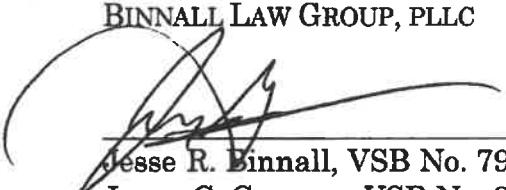
WHEREFORE, Plaintiff Richard Grenell, demands judgment against Defendant Olivia Troye, as follows:

1. Damages in the amount to be proved at trial, up to \$5,000,000;
2. Punitive Damages in an amount to be proven at trial, up to \$1,000,000;
3. Costs of suit; and
4. Such other and further relief as the Court deems necessary and proper.

Dated: April 12, 2024

RICHARD GRENELL  
By Counsel

BINNALL LAW GROUP, PLLC

  
Jesse R. Binnall, VSB No. 79292  
Jason C. Greaves, VSB No. 86164  
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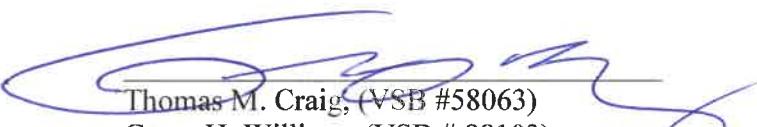
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